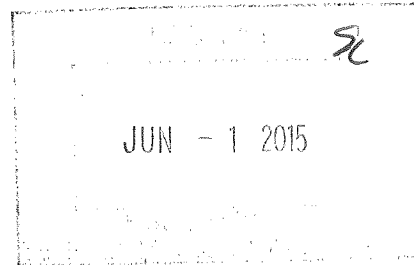




June 1, 2015



Sara Clark, Secretary
Cable Television Division
Department of Telecommunications & Cable
1000 Washington Street, Suite 820
Boston, MA 02118-6500

Re: Charter Communications: Record Requests Docket DTC 14-6

Dear Ms. Clark:

Enclosed please find Charter Communications ("Charter") response to the Record Requests per the rate hearing held on May 13, 2015 concerning the FCC Form 1240 and FCC Form 1205 filings currently under review for 2015 rates.

If you have any further questions or comments please feel free to contact me at (817) 298-3689.

Respectfully yours,

A handwritten signature in cursive script that reads 'Melissa Robinson'.

Melissa Robinson
Senior Regulatory Analyst

Enclosures

Cc: Vicki DeSantis
Tom Cohan
Sean Carroll
Lindsay DeRoche
Joslyn Day
Corey Pilz
Karlen Reed
Armine Simonyan
Michael Mael

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FCC Form 1240

D.T.C. – RR - 1-1 Regarding Charter's 2013 acquisition of Optimum West:

- a. Please provide the number of Optimum West subscribers that Charter acquired through the transaction.
- b. Please provide the number of Optimum West employees that Charter acquired through the transaction.

Response: *Person providing the response: Melissa Robinson, Senior Regulatory Analyst*

- a. Charter acquired 356,000 Optimum West Subscribers through the transaction.
- b. Charter acquired 935 Optimum West technical operation employees through the transaction applicable to the FCC Form 1205 calculation; 1,430 total employees acquired.

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FCC Form 1240

D.T.C. – RR - 1-2 Referring to Charter's April 17, 2015, response to Information Request D.T.C. 1-7, please provide a calculation of what portion of the increase in labor hours (Line 6, Step A) from the previous year's FCC Form 1205 to this year's FCC Form 1205 is attributable to the addition of Optimum West employees and what portion of the increase is attributable to other factors. In addition, please provide a breakdown in narrative form of the portion of the increase attributable to the addition of Optimum West employees and the portion of the increase attributable to other factors. Include in this discussion an identification of the other factors.

Response: *Person providing the response: Melissa Robinson, Senior Regulatory Analyst*

Personnel/headcount used in the Form 1205 calculation increased from 12,627 in 2012 to 13,874 in 2013, for a change of 1,248 (10% increase). Of this 1,248 increase, 935 (75%) employees are attributable to the Optimum West acquisition and 313 (25%) is attributable to other factors.

Labor Hours increased from 8,736,401 in 2012 to 9,896,734 in 2013, for a change of 1,160,333 labor hours. The annual change represents a 13.3% total labor hours increase - 10% (75% * 13.3%) due to Optimum West acquisition and 3.3% due to other changes.

Other factors/changes referred to above include increased employees due to performing more installations in-house vs. contractor installations and increase in repair hours incurred due to the rise of digital receiver equipment in homes due to the all digital roll-out.

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FCC Form 1205

D.T.C. – RR - 1-3 Please provide complete and detailed documentation of the accounting treatment of regulated assets acquired in Charter's 2013 acquisition of Optimum West that Charter integrated into this year's FCC Form 1205.

Response: *Person providing the response: Melissa Robinson, Senior Regulatory Analyst*

Charter utilized a 3rd party valuation company to adjust the fixed assets acquired from the Optimum West properties to fair market value in accordance with GAAP (Accounting Standards Codification ("ASC") Topic 805, Business Combinations ("ASC 805") and Topic 820, Fair Value Measurements and Disclosures ("ASC 820")). The company used by Charter is an industry leader in the valuation of cable companies and has been used by Charter to perform the revaluation of the company after it emerged from bankruptcy and other smaller acquisitions. This company has been used by Comcast, Time Warner, Cablevision and others to do similar valuations. The 148 page detailed appraisal report is not provided in this response due to confidentiality clauses within our agreement.

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FCC Form 1205

D.T.C. – RR - 1-4

Regarding Charter's Interactive Guide Service ("IGS"):

- a. In the event a subscriber with an IGS-enabled converter box opts not to subscribe to the IGS, please state whether Charter is able to remove the IGS from the converter box.
- b. If Charter cannot remove the IGS from an IGS-enabled converter box, please justify Charter's claim that the IGS is not regulated equipment under the FCC's rules.
- c. Using the most recent data available, please provide the take rate in Massachusetts for the IGS.

Response:

Person providing the response: Melissa Robinson, Senior Regulatory Analyst

- a. Yes, the Interactive Guide Service ("IGS") function can be removed from the digital receiver. Removal of Charter's IGS is available upon subscriber request. If a subscriber request is made for a standard digital receiver without the IGS fee, deactivation of IGS function is handled through a unique billing code on the subscriber's account.
- b. N/A. As noted above, Charter can remove the IGS function. Charter's interactive guide service is a software-based service and is not a component of equipment subject to the Form 1205.
- c. Virtually every subscriber in Massachusetts "takes" the IGS, as it materially enhances the subscription service, and we actively promote the IGS for that reason. There is one subscriber in Massachusetts who has two standard digital receivers which have had the IGS deactivated.